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JAN 27 1999

January 27, 1999

Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th, SW
Washington, DC 20554

Re: The Use of N11 Codes and Other Abbreviated Dialing
Arrangements, CC Docket No. 92-105

Dear Ms. Salas:

As encouraged by the Federal Communications Commission in the Public Notice,
a diskette of Reply Comments of GTE and one hard copy are enclosed in the
above-captioned proceeding.

Sincerely,


Andre J. Lachance

Enclosures

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**Before the
Federal Communications Commission
Washington, D.C. 20554**

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JAN 27 1999

U.S. DEPARTMENT OF JUSTICE
FEDERAL BUREAU OF INVESTIGATION

In the Matter of)	
)	
Common Carrier Bureau Seeks)	CC Docket No. 92-105
Comment on North American)	NSD File No. L-98-139
Numbering Council Recommendation)	
Concerning Abbreviated)	
Dialing Arrangements)	

REPLY COMMENTS OF GTE

Dated: January 27, 1999

GTE Service Corporation and its affiliated
telecommunications companies

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REPLY COMMENTS OF GTE

GTE Service Corporation and its affiliated telecommunications companies (collectively, "GTE")¹ respectfully submit reply comments in response to the *Public Notice* issued by the Common Carrier Bureau seeking comments on the Report and Recommendations of the Abbreviated Dialing Ad Hoc Working Group to the North American Numbering Council (NANC) Regarding Abbreviated Dialing Arrangements ("Report").²

¹ These comments are filed on behalf of GTE's affiliated domestic telephone operating companies, GTE Wireless Incorporated and GTE Communications Corporation, Long distance Division. GTE's domestic telephone operating companies are: GTE Alaska, Incorporated, GTE Arkansas Incorporated, GTE California Incorporated, GTE Florida Incorporated, GTE Hawaiian Telephone Company Incorporated, The Micronesian Telecommunications Corporation, GTE Midwest Incorporated, GTE North Incorporated, GTE Northwest Incorporated, GTE South Incorporated, GTE Southwest Incorporated, Contel of Minnesota, Inc., and Contel of the South, Inc.

² Common Carrier Bureau Seeks Comment on North American Numbering Council Recommendation Concerning Abbreviated Dialing Arrangements, *Public Notice*, DA 98-2541, released December 14, 1998.

I. INTRODUCTION

GTE is a multi-faceted telecommunications company that includes incumbent local exchange carriers ("ILECs"), a competitive local exchange carrier ("CLEC") operating in other ILEC territories, a provider of wireless services, and a long distance telecommunications service provider. As an active participant in the Ad Hoc Group, GTE supports the recommendations set forth in the NANC Report and commends the Working Group for reaching well-balanced conclusions in response to the complex issues potentially associated with the implementation of abbreviated dialing arrangements ("ADAs").

II. DISCUSSION

A. **There is no need at this time for additional nationally administered abbreviated dialing arrangements.**

Considerable discussion was held within the Ad Hoc Working Group regarding the need for ADAs. The Working Group observed that a variety of numbering resources exist, e.g., 900 NPA, 976 NXX, and 555 NXX numbers, that are currently available to accommodate information services. The Working Group and a number of commenting parties (AT&T Corp. page 2, Primeco Personal Communications, L.P. page 3) concluded that there appears to be little, if any, demonstrated need for additional nationally administered abbreviated dialing arrangements at this time. Indeed, the Ad Hoc Working Group's findings confirm the Commission's earlier and similar finding.³

³ The Use of N11 Codes and Other Abbreviated Dialing Arrangements, *First Report And Order and Further Notice of Proposed Rulemaking*, 12 FCC Rcd 5572, 5608 (¶ 61) (1997).

MCI WorldCom and Low Tech Design, Inc., on the other hand, argue that there exists a demonstrated need for abbreviated dialing arrangements. MCI WorldCom, in particular, is critical of the work performed by the Working Group. It argues that rather than fulfill its mandate to explore rapid implementation of national abbreviated dialing alternatives, the Working Group never undertook any serious inquiry into the issues of development, implementation and timeframes for achieving national abbreviated dialing. Rather, it argues that the Report is merely an effort by incumbent local exchange carriers ("ILECs") to restrict development of new dialing formats in order to preserve their monopoly use of those dialing arrangements, and by wireless carriers seeking to ensure their continued exclusive use of wireless-only dialing formats.⁴

GTE strongly disputes MCI WorldCom's allegations. These allegations are nonsensical and simply reflect MCI WorldCom's dissatisfaction with the consensus recommendations of representatives from all major segments of the industry. The statements are in no way reflective of the professional analysis and well-researched conclusions that were reached by the Ad Hoc Working Group.

Moreover, GTE notes that neither MCI WorldCom nor Low Tech Designs has attempted to offer abbreviated dialing service to their respective customers, nor have they described what services would be offered to the general public. Thus, their claims that actual demand currently exists for ADAs are completely unfounded. GTE, on the other hand, has actual experience in the market. GTE Florida, Inc., for example, has had an ADA tariff in effect in Florida (which was mandated by the Florida Public Service

⁴ MCI WorldCom Comments at 2-3.

Commission) since September 15, 1995. To date, GTE has no customers for the offering. The Florida example strongly supports the Commission and the Working Group's conclusion that there appears to be little, if any, demonstrated need for additional nationally administered abbreviated dialing arrangements at this juncture.

As part of its attack on the Working Group's finding that additional ADAs are unnecessary, MCI WorldCom challenges the Working Group's conclusion that other numbering resources, such as 900 SAC, 976 NXX, and 555 NXX numbers, are available to information service providers. In particular, MCI WorldCom questions the ILECs' commitment to make 555 NXX numbers available. In support of its argument, it claims GTE has stated that it has no intention of implementing 555 access arrangements for other service providers.⁵

In this respect, MCI WorldCom grossly misrepresents the facts. GTE has objected to the use of the 555 numbering resource because the industry has not adopted a universal method of delivering this service. However, GTE frequently reviews requests for this service and attempts to determine if it is feasible to provide the service as delineated by customers' requests. The MCI WorldCom statement is a distortion of GTE's actions and is an attempt to misquote and misrepresent GTE's efforts with respect to supporting 555 services.

⁵ MCI WorldCom Comments at 7-8.

B. GTE supports the Working Group's conclusion that abbreviated dialing arrangements should not be used for POTS, carrier access, and speed dialing arrangements.

The report (at 7-8) states that the Working Group agrees that ADAs should not be used for plain old telephone service ("POTS"), carrier access, or speed dialing arrangements offered in PBXs or as switch-based services. The Working Group reasoned that using ADAs for such services would quickly exhaust the possible supply of abbreviated dialing formats. GTE strongly supports the comments of parties (SBC Communications, Inc. at page 1, USTA at page 3) that concur with this finding.

C. Vertical service codes should not be used for abbreviated dialing purposes.

GTE contends that ADAs and vertical service codes ("VSCs") are two completely different numbering applications. VSCs are customer dialed codes in the *XX dialing format for touch tone and 11XX format for rotary telephones. The codes provide consistent accessibility throughout the Public Switched Telephone Network to features and services such as call forwarding and automatic callback.

Standardized VSCs are designed to minimize customer confusion and to provide a standard service access platform for features and services within multiple individual networks, e.g., multi-network applications. Abbreviated dialing arrangements are a set or sequence of less than seven digits that are dialed and then mapped or translated to an address that is seven digits or greater in length. Abbreviated dialing codes and VSCs are completely different numbering concepts. GTE therefore concurs with Primeco Personal Communication's (at pages 3-5) contention that the use of star codes "in any form – as part of an abbreviated dialing format is inappropriate."

D. Low Tech Design's argument opposing the use of the pound sign as an ADA delimiter was considered and rejected by the Working Group.

GTE disagrees with Low Tech Design, Inc.'s arguments (at page 2) opposing the use of the pound sign ("#") as recommended by the Ad Hoc Working Group. GTE steadfastly concurs with the consensus recommendation of the Working Group that a format involving either a leading and/or trailing "#" delimiter be implemented for abbreviated dialing arrangements. The Report noted that several alternative formats, including expansion of *XX/11XX, were thoroughly analyzed before the consensus opinion was reached. While there is no set of dialed digits to represent the "#" symbol, use of the "#" symbol for further abbreviated dialing arrangements remains the best solution.

III. CONCLUSION

GTE urges the Commission to accept and adopt the recommendations of the North American Numbering Council with respect to abbreviated dialing arrangements. Comments opposing the NANC Report represent minority viewpoints that were considered and rejected by NANC in adopting its consensus position.

Dated: January 27, 1999

Respectfully submitted,

GTE Service Corporation and its affiliated
telecommunications companies

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CERTIFICATE OF SERVICE

I, Judy R. Quinlan, hereby certify that copies of the foregoing "Reply Comments of GTE" have been mailed by first class United States mail, postage prepaid, on January 27, 1999 to the parties on the enclosed list.

A handwritten signature in cursive script, appearing to read "Judy R. Quinlan", is written over a horizontal line.

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